

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-11314-PBS

ST. PAUL TRAVELERS, as successor in  
interest to ATLANTIC MUTUAL  
INSURANCE CO. Marine Division, subrogee  
of IBEX LLC, and IBEX, LLC

Plaintiffs

v.

FAIRHAVEN SHIPYARD, INC., and A.I.  
MARINE ADJUSTERS, INC., a member of  
AMERICAN INTERNATIONAL GROUP,  
INC.,

Defendants

PLAINTIFF DESIGNATION OF  
EXPERT WITNESSES

Now come the plaintiffs, ST. PAUL TRAVELERS and IBEX LLC, and pursuant to this  
Court's Order dated November 3, 2004, designate their expert witnesses as follows:

- (a) Mr. R. Joel Sparrow, Marine Surveyor;  
Milligan and Sparrow, Inc.  
P.O. Box 566270  
Miami, FL 33256-6270

Subject: Condition of hull and source of fuel leaks in April, 2004

- (b) Anthony Knowles, Marine Surveyor  
Newport Marine Surveyors' Group  
7 Baldwin Road  
Middletown, RI 02842

Subject: Initial repairs to M/Y IBEX at Fairhaven Shipyard in 2001, and repair-related  
expenses

- (c) Theodore A. Toth  
President  
Applied Metals Science, Inc.  
Metallurgical Consulting  
4740 126<sup>th</sup> Avenue, Suite L-F  
Clearwater, FL 33762

Subject: Cause of fuel leakage from portions of the hull/fuel tank repaired by Fairhaven  
Shipyard in 2001.

- (d) Michael Keyworth  
Brewer Cove Haven Marina  
101 Narragansett Avenue  
Barrington, RI 02806

Subject: Discovery and analysis of faulty welding repairs in summer, 2002 related to June 2001 grounding.

- (e) Peter W. Ebbutt, N.A.  
Marine Architect  
Ocean Motions  
2582 Fleming Grant Road  
Micco, FL 32976

Subject: Causal analysis of faulty repairs to hull/fuel tanks of M/Y IBEX related to June 2001 grounding.

Plaintiffs will timely prepare, file and serve their F.R.C.P. 26(a)(2)(B) expert disclosures, and its F.R.C.P. 26(a)(3)(C) fact witness and exhibit disclosures within the time provided for by the Rule.

The plaintiffs reserve the right to seasonably supplement or amend their expert designation.

Respectfully submitted,

Plaintiffs,

ST. PAUL TRAVELERS and IBEX LLC

/s/ William Hewig III  
William Hewig, III (BBO# 541910)  
Kopelman and Paige, P.C.  
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